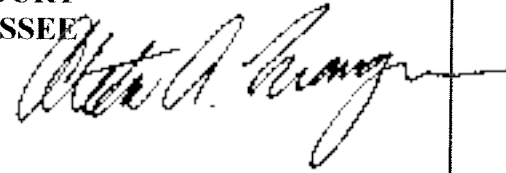


UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE



UNITED STATES OF AMERICA

V.

CHANNIN A. RANDOLPH

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NO. 3:11-cr-00082 - 6

JUDGE TRAUGER

MOTION TO CONTINUE SENTENCING HEARING

Comes now the defendant, Channin A. Randolph, by and through counsel of record, Robert D. Massey, and for his Motion to Continue Sentencing Hearing would show unto the Court the following:

1. The Defendant entered an open plea on June 26, 2012.
2. The sentencing hearing has heretofore been scheduled for November 1, 2012 at 1:30 p.m.
3. The parties have scheduled a safety valve meeting on at least two (2) occasions but based on issues beyond their control have been unable to have the meeting.
4. There are currently two (2) separate trial dates scheduled for the co-defendant's who have not pled relative to this conspiracy with the trials beginning on or about October 23, 2012 and January 8, 2013.
5. Counsel for the defendant and the government are communicating with the probation officer relative to needed information for the presentence report and counsel for the government and the defendant agree that the safety valve meeting needs to be concluded in advance of the sentencing hearing and at a time so that the result of same can be taken into consideration by the probation officer and appropriately included in the presentence report.